

**IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

RYAN, LLC.,

Plaintiff,

CHAMBER OF COMMERCE OF THE  
UNITED STATES OF AMERICA, et al.,

Plaintiff-Intervenors,

v.

FEDERAL TRADE COMMISSION,

Defendant.

Case No. 3:24-cv-00986-E

**UNOPPOSED MOTION OF PROFESSORS WILLIAM ARAIZA, JEFFREY  
LUBBERS, AND PETER M. SHANE TO PROCEED WITHOUT LOCAL  
COUNSEL**

Pursuant to Local Rule 83.10, proposed *amici curiae* Professors William Araiza, Jeffrey Lubbers, and Peter M. Shane (“proposed amici”) respectfully seek the Court’s leave to proceed without local counsel. Proposed *amici* are leading scholars of administrative law and statutory interpretation, and intend to seek this Court’s leave to file an *amicus* brief in this case.

Proposed *amici* will seek only to file an *amicus* brief, and their motion to do so will be unopposed. *Amici* are not seeking party status or the opportunity to present oral argument, and will not need to appear in person in connection with this

matter. The Court has granted leave to proceed without local counsel to other *amici* in this matter. ECF 58, 64, 74.

Counsel for proposed *amici* have reviewed the Local Rules for the Northern District of Texas and this Court's procedures.

Undersigned counsel has conferred with counsel for Plaintiff, Plaintiff-Intervenors, and Defendant. Counsel for Plaintiff and Plaintiff-Intervenors consent to this motion. Counsel for Defendant take no position on the motion.

## **CONCLUSION**

This Court should grant proposed *amici* leave to proceed without local counsel.

Dated: May 31, 2024

Respectfully submitted,

/s/Mark B. Samburg  
Mark B. Samburg  
D.C. Bar No. 1018533  
(*pro hac vice pending*)  
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*Counsel for proposed Amici Curiae*

**CERTIFICATE OF CONFERENCE**

I hereby certify that I conferred with counsel for Plaintiff, Plaintiff-Intervenors, and Defendant. Counsel for Plaintiff and Plaintiff-Intervenors indicated that they consent to this motion. Counsel for Defendant took no position on this motion.

/s/Mark B. Samburg

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed this document using the ECF System on May 31, 2024, which will send notification to all counsel of record.

/s/Mark B. Samburg